

RESNICK & LOUIS, P.C.
CARISSA YUHAS
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*Attorney for Defendant,
Circus Circus LV, LLC*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

VICTORIA GONZALEZ LERMA,
individually,

CASE NO.: 2:23-CV-01734

Plaintiff.

STIPULATION AND ORDER FOR DISMISSAL WITH PREJUDICE

CIRCUS CIRCUS LV, LLC; OTIS
ELEVATOR COMPANY; DOES I – X; and
ROE CORPORATIONS I – X, inclusive,

Defendants.

IT IS HEREBY STIPULATED by and between Defendant, CIRCUS CIRCUS LV, LLC, through its attorney, CARISSA YUHAS, ESQ. of the law firm of RESNICK & LOUIS, P.C., Defendant, OTIS ELEVATOR COMPANY, through its attorney, REBECCA L. MASTRANGELO, ESQ. of the law firm of ROGERS, MASTRANGELO, CARVALHO & MITCHELL, and Plaintiff, VICTORIA GONZALEZ LERMA, in proper person, that all of Plaintiff's claims arising out of the May 17, 2022 elevator incident and asserted in the Amended Complaint in Case No. 2:23-CV-01734 be dismissed with prejudice in their entirety, with each of the parties to bear their own attorney fees and costs.

1 IT IS FURTHER STIPULATED that no trial is currently scheduled in this matter.
2
3

4 DATED this 26th day of March, 2024.

5 DATED this 26th day of March, 2024.

6 RESNICK & LOUIS, P.C.

7 */s/ Victoria Gonzalez Lerma*

8 By: */s/ Carissa Yuhas*

9 By: VICTORIA GONZALEZ LERMA
10 3312 W. Hadley Street
11 Phoenix, AZ 85009
12 vickygon258@gmail.com
13 Plaintiff in proper person

14 By: CARISSA YUHAS, ESQ.
15 Nevada Bar No. 14692
16 8945 W. Russell Road, Suite 330
17 Las Vegas, NV 89148
18 Attorney for Defendant,
19 Circus Circus LV, LLC

20 DATED this 26th day of March, 2024.

21 ROGERS, MASTRANGELO, CARVALHO
22 & MITCHELL

23 */s/ Rebecca L. Mastrangelo*

24 By: REBECCA L. MASTRANGELO, ESQ.
25 Nevada Bar No. 5417
26 700 South Third Street
27 Las Vegas, NV 89101
28 Attorney for Defendant,
Otis Elevator Company

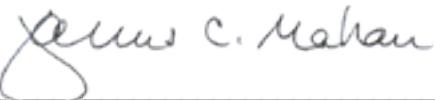
1 2:23-CV-01734

2 **ORDER**

3
4 **IT IS HEREBY ORDERED**, that all of Plaintiff's claims arising out of the May 17,
5 2022 elevator incident and asserted in the Amended Complaint in Case No. 2:23-CV-01734 be
6 dismissed with prejudice in their entirety, with each of the parties to bear their own attorney fees
7 and costs.

8 **IT IS FURTHER ORDERED** that no trial is scheduled in this matter.
9

10 DATED March 28, 2024.

11 
12

13

UNITED STATES DISTRICT JUDGE
14

15 Respectfully submitted by:
16

17 **RESNICK & LOUIS, P.C.**

18 /s/ *Carissa Yuhas*

19

CARISSA YUHAS, ESQ.
20 Nevada Bar No. 14692
21 8945 W. Russell Road, Suite 330
Las Vegas, NV 89148
Attorney for Defendant,
Circus Circus LV, LLC

22
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Lisa Bell

To: Carissa Yuhas
Subject: RE: Victoria Gonzalez Lerma v. Circus Circus/Otis Elevator Co.

From: Rebecca Mastrangelo <rmastrangelo@rmcmlaw.com>
Sent: Monday, March 25, 2024 5:20 PM
To: Carissa Yuhas <cyuhas@rlattorneys.com>
Subject: RE: Victoria Gonzalez Lerma v. Circus Circus/Otis Elevator Co.

Yes, you can e sign for me on behalf of Otis.

Thank you very much!

Rebecca

From: Carissa Yuhas <cyuhas@rlattorneys.com>
Sent: Monday, March 25, 2024 4:52 PM
To: Rebecca Mastrangelo <rmastrangelo@rmcmlaw.com>
Subject: FW: Victoria Gonzalez Lerma v. Circus Circus/Otis Elevator Co.

Rebecca,

Plaintiff agreed to the stipulation to dismiss. Do I also have your permission to electronically sign on your behalf and submit the attached?

Best,

Carissa Yuhas, Esq.

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From: Victoria Gonzalez <vickygon258@gmail.com>
Sent: Monday, March 25, 2024 3:51 PM
To: Carissa Yuhas <cyuhas@rlattorneys.com>
Subject: Re: Victoria Gonzalez Lerma v. Circus Circus/Otis Elevator Co.

Yes, I approve.

On Fri, Mar 22, 2024 at 10:41 AM Carissa Yuhas <cyuhas@rlattorneys.com> wrote:

Thank you Ms. Gonzalez. Just to confirm so there is no confusion – I have your permission to electronically sign the stipulation to dismiss on your behalf?

Carissa Yuhas, Esq.

Resnick & Louis, P.C.

8945 West Russell Road, Suite 330

[Las Vegas, NV 89148](#)

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From: Victoria Gonzalez <vickygon258@gmail.com>
Sent: Thursday, March 21, 2024 10:18 PM
To: Carissa Yuhas <cyuhas@rlattorneys.com>
Subject: Re: Victoria Gonzalez Lerma v. Circus Circus/Otis Elevator Co.

Yes, please proceed.

On Thu, Mar 21, 2024 at 10:13 AM Carissa Yuhas <cyuhas@rlattorneys.com> wrote:

Good morning,

I am just following up on my emails below. If you are still interested in dismissing your case, all we need from you is your dated signature on page 2 of the attached document (you can sign and email it back to me or respond to this email that I have your permission to electronically sign it on your behalf).

If you are not agreeable to dismissal, we will be proceeding with motion work shortly to obtain dismissal based on your lack of participation in discovery and may also ask for an order against you to pay our attorney's fees (as we had discussed before).

Please let me know if you have any questions.

Best,

Carissa Yuhas, Esq.

Resnick & Louis, P.C.

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Direct Phone: 702-850-2680

cyuhas@rlattorneys.com

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From: Carissa Yuhas
Sent: Thursday, March 14, 2024 1:56 PM
To: Victoria Gonzalez <vickygon258@gmail.com>
Subject: FW: Victoria Gonzalez Lerma v. Circus Circus/Otis Elevator Co.
Importance: High

Good afternoon,

I am just following up on my email below. Please let me know if you have any questions.

Best,

Carissa Yuhas, Esq.

Resnick & Louis, P.C.

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Las Vegas, NV 89148

Direct Phone: 702-850-2680

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From: Carissa Yuhas
Sent: Tuesday, March 12, 2024 12:33 PM
To: vickygon258@gmail.com; Rebecca Mastrangelo <rmastrangelo@rmcmlaw.com>
Cc: Lisa Bell <lbell@rlattorneys.com>; Jessica Humphrey <jhumphrey@rlattorneys.com>
Subject: Victoria Gonzalez Lerma v. Circus Circus/Otis Elevator Co.

Good afternoon,

I have attached a copy of the proposed stipulation and order to dismiss this case for your review and approval.

Ms. Gonzalez – I left you a voicemail today discussing that this would be an option for us to dismiss your case as you previously indicated to me that you were wanting to do this. If you are still interested in dismissing your case, all we need from you is your dated signature on page 2 of the attached document (you can sign and email it back to me or respond to this email that I have your permission to electronically sign it on your behalf).

If you are not agreeable to dismissal, we will be proceeding with motion work to obtain dismissal based on your lack of participation in discovery and may also ask for our attorney's fees to be awarded (as we had discussed before).

If you have any questions regarding the above, please feel free to contact me at 801-783-8674. I would be happy to discuss.

Best,

Carissa Yuhas, Esq.

Resnick & Louis, P.C.

8945 West Russell Road, Suite 330

Las Vegas, NV 89148

Direct Phone: 702-850-2680

cyuhas@rlattorneys.com

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